


Exhibit C

From: Andrew Phillips andy.phillips@mwpp.com 
Subject: Re: Logan Paul v. Stephen Findeisen and Coffee Break Productions, LLC
Date: February 4, 2025 at 6:19 PM
To: Caroline Small csmall@dslawpc.com, Shannon Timmann shannon.timmann@mwpp.com, Jeffrey Neiman jneiman@mnlawfirm.com, Jason Mays jmays@mnlawfirm.com, rcedillo@lawdcm.com
Cc: Jason Davis jdavis@dslawpc.com, Rachel Garza Rgarza@dslawpc.com, Erin Green egreen@dslawpc.com

Hi Caroline,

The documents in question generally consist of private messages between Mr. Paul and personal friends/business associates. As we've previously stated in a letter to which you did not respond, the Protective Order that Defendants agreed to, and the Court entered, expressly permits designation of such communications as "Confidential" if the communications were made with the understanding or reasonable expectation that they would not become available to the general public. There is no basis to suggest that the communications for which you are challenging Confidentiality designations in the below email and your January 28 letter were ever reasonably contemplated to be for public consumption.

During our last meet and confer call, you and Mr. Davis claimed that you don't think the plain language of the Protective Order means exactly what it says in that regard and said that you would send us some authority to support that position. You did not do so, but instead have now sent us two "notices" of your challenge to the designation of such materials.

I ask again, do you have some basis to contend that private messages not intended for public consumption are not properly designated as Confidential, despite the Protective Order saying exactly that? We do intend to file a motion with the Court on this issue if you insist on the improper challenge so I must request again that you provide some basis for requiring us to do so. Absent a satisfactory response, we expect that we will seek costs and fees for the time and expense required to ask the Court to confirm that the Protective Order says exactly what it says.

Andrew C. Phillips
Managing Partner
MEIER WATKINS PHILLIPS PUSCH LLP

919 18th St NW, Suite 650

Washington, DC 20006

Direct: 847.951.7093

www.mwpp.com



From: Caroline Small <csmall@dslawpc.com>

Date: Tuesday, February 4, 2025 at 5:43 PM

To: Andrew Phillips <andy.phillips@mwpp.com>, Shannon Timmann <shannon.timmann@mwpp.com>, Jeffrey Neiman <jneiman@mnrlawfirm.com>, Jason Mays <jmays@mnrlawfirm.com>, rcedillo@lawdcm.com <rcedillo@lawdcm.com>

Cc: Jason Davis <jdavis@dslawpc.com>, Rachel Garza <Rgarza@dslawpc.com>, Erin Green <egreen@dslawpc.com>

Subject: Logan Paul v. Stephen Findeisen and Coffee Break Productions, LLC

Counsel,

I write to address your designation of PAUL_CZ00006565-00009405 in your recent production as CONFIDENTIAL. These documents contain chat messages between Logan Paul and third parties and do not appear to constitute confidential or classified information as defined in the protective order.

If your position on these designations is the same as that set forth in your January 16, 2025 letter, then please consider this notice of our challenge to the designation under Section 11 of the protective order. If you have a different position, please let us know your earliest availability to confer on the same.

Regards,
Caroline

**DAVIS
SANTOS**

Caroline Newman Small
Partner

719 S. Flores Street
San Antonio, Texas 78204
dslawpc.com

P: (210) 853-5882
F: (210) 200-8395
C: (210) 827-3765

E: csmall@dslawpc.com

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